

**UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF MISSOURI  
EASTERN DIVISION**

**Christopher Miller,  
Plaintiff,**

**VS.**

**Commercial Recovery Systems, Inc.,**  
**Defendant.**

**CIVIL ACTION NO.:**

## JURY TRIAL DEMANDED

## UNLAWFUL DEBT COLLECTION PRACTICES

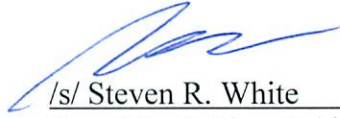
## COMPLAINT

1. Plaintiff Christopher Miller is a resident of St. Louis County, Missouri.
2. Defendant Commercial Recovery Systems, Inc. is a Texas Corporation with its business location and registered agent located in Dallas County, Texas.
3. During May, 2012 to December, 2012, Defendant placed non-emergency telephone calls to Plaintiff's cellular telephone using an automatic telephone dialing system and using pre-recorded or artificial voice without Plaintiff's prior express consent in violation of 47 U.S.C § 227 (b)(1)(A)(iii).

WHEREFORE, Plaintiff prays for judgment against defendant for statutory damages of \$500.00 per call, additional damages of up to \$1,000.00 per call, and for such other and further relief as the Court may deem just and proper in this cause.

**PLAINTIFF HEREBY REQUESTS A TRIAL BY JURY**

Respectfully submitted,



/s/ Steven R. White

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